

1 **IN THE UNITED STATES DISTRICT COURT**
2 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

3 CALIFORNIA COALITION FOR WOMEN
4 PRISONERS; et. al.,

5 Plaintiffs

6 v.

7 UNITED STATES OF AMERICA FEDERAL
8 BUREAU OF PRISONS, et. al.,

9 Defendants.

CASE NO. 4:23-CV-04155-YGR


**DECLARATION OF
MADISON L. MATTIOLI**

10 I, Madison L. Mattioli, hereby declare as follows:

- 11 1. I am an Assistant United States Attorney appearing in this case.
 - 12 2. The United States is requesting a 28-day continuance of the hearing for final approval of the
13 proposed Consent Decree. Good cause for this request exists as the undersigned does not have
14 sufficient information to ascertain whether BOP has the resources to implement the Consent
15 Decree, specifically with respect to the Monitor's estimated fees and costs during the period of
16 monitoring. The recent change in administration, the change in key personnel, and the issuance
17 of Executive Orders and Attorney General Memos that may impact some provisions in the
18 Consent Decree, independently necessitate a continuance of the final approval hearing so newly
19 appointed Senior Department of Justice leadership can continue to review the proposed Consent
20 Decree and provide guidance on implementation.
 - 21 3. The undersigned conferred at length with Class Counsel, Kara Janssen, regarding this request
22 through email and over the phone. These unforeseen practical realities were explained, but Class
23 Counsel indicated that they oppose the government's request.
 - 24 4. Continuing this hearing for a period of 28 days and maintaining the status quo will not prejudice
25 Class Members as the current monitoring structure is not set to expire until March 31, 2025, and
26 there will be no lapse in monitoring.
 - 27 5. There have been no previous modifications of this deadline.
- 28

1 6. This continuance will have the effect of delaying the Effective Date by 28 days, but will not
2 affect the length of the proposed Consent Decree as it is set to run for two years from the
3 Effective Date.

4 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and
5 correct. Executed this 13th day of February, 2025, at Helena, Montana.

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9 Madison L. Mattioli
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